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Attorney for R.M. Galicia, Inc. d/b/a Progressive Management Systems

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

|                        |   |                               |
|------------------------|---|-------------------------------|
| PAMELA CHYBA,          | ) | Case No. 12-CV-1723 MMA BLM   |
|                        | ) |                               |
| Plaintiff,             | ) | JOINT MOTION FOR EXTENSION OF |
|                        | ) | TIME FOR DEFENDANT TO RESPOND |
| vs.                    | ) | TO COMPLAINT                  |
|                        | ) |                               |
| PROGRESSIVE MANAGEMENT | ) |                               |
| SYSTEMS,               | ) |                               |
|                        | ) |                               |
| Defendant.             | ) |                               |

Defendant, R.M. Galicia, Inc. d/b/a/ Progressive Management Systems, and Plaintiff, Pamela Chyba, jointly move for approval of their agreed 14-day extension for Defendant to respond to the Complaint.

Plaintiff filed this action on July 11, 2012. Defendant was served on August 10, 2012. The parties would like time to engaged in settlement discussions and agree to extend for 14 days, until September 14, 2012, defendant's time to respond to the Complaint.

1 The parties jointly request approval of their agreed 14-day extension.

2 **SIGNATURE CERTIFICATION**

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4 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies  
5 and Procedures Manual, I hereby certify that the content of this document is acceptable to  
6 Plaintiff Pamela Chyba and that I have obtained Ms. Chyba's approval of her electronic  
7 signature to this document.  
8

9 Respectfully submitted,

10 Dated: Aug 31, 2012

11 /s/ Pamela Chyba  
12 Pamela Chyba  
13 Plaintiff

14 Dated: Aug. 31, 2012

Sessions, Fishman, Nathan & Israel, L.L.P.

15 /s/ Debbie P. Kirkpatrick  
16 Debbie P. Kirkpatrick  
17 Attorney for Defendant  
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